

UNITED STATES DISTRICT COURT

for the

District of

Division

Case No. **3 : 18 cv 312**

(to be filled in by the Clerk's Office)

CHAD EDWARD HOLLEY

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ABC TELEVISION NETWORKS, LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☐ No

THOMAS M. ROSE

SHARON L. OVINGTON

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

CHAD EDWARD HOLLEY

Street Address

1087 W. 2nd St.

City and County

XENIA GREENE COUNTY

State and Zip Code

OHIO 45385

Telephone Number

(727) 478 9614

E-mail Address

cholley66@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name ABE TELEVISION NETWORKS, LLC.
 Job or Title (if known) BROADCASTING COMMUNICATION
 Street Address 212 45th STREET
 City and County NEW YORK
 State and Zip Code NEW YORK 10017
 Telephone Number 212-210-1400
 E-mail Address (if known) _____

Defendant No. 2

Name PASCO COUNTY SHERIFF OFFICE
 Job or Title (if known) PROTECT AND SERVE
 Street Address 8700 CITIZENS DR.
 City and County NEW PORT RICHEY, PASCO COUNTY
 State and Zip Code FLORIDA, 34654
 Telephone Number 727-847-8102
 E-mail Address (if known) css@pascosheriff.org

Defendant No. 3

Name MEDICAL CENTER OF TRINITY
 Job or Title (if known) BEHAVIOR HEALTH
 Street Address 9330 FL-54
 City and County TRINITY, PASCO COUNTY
 State and Zip Code FLORIDA 34655
 Telephone Number 727-834-4000
 E-mail Address (if known) _____

Defendant No. 4

Name YOUTUBE, LLC
 Job or Title (if known) ELECTRONIC MEDIA COMMUNICATION
 Street Address 901 CHERRY AVE
 City and County SAN BRUNO
 State and Zip Code CALIFORNIA 94066
 Telephone Number 650-253-0000
 E-mail Address (if known) _____

VERIFY PRESENCE OF ODH WATERMARK HOLD TO LIGHT TO VIEW

STATE OF OHIO
OFFICE OF VITAL STATISTICS

CERTIFICATION OF BIRTH

STATE FILE NUMBER	1982078357	DATE RECORD FILED	07/20/1982
NAME	CHAD EDWARD HOLLEY		
DATE OF BIRTH	07/15/1982	SEX	MALE
BIRTHPLACE	OHIO		
MOTHER'S NAME	DENISE ANN HOLLEY	FATHER'S NAME	CHRIS EDWARD HOLLEY
LAST NAME PRIOR TO FIRST MARRIAGE	FREELAN		
MOTHER'S BIRTHPLACE	OHIO	FATHER'S BIRTHPLACE	OHIO

Note: This is a true certification of the name and birth facts as recorded in the Office of Vital Statistics, Columbus, Ohio. Witness my signature and seal of the Department of Health this 29 day of August, 2018

Julia H. B. Neely
State Registrar of Vital Statistics

HE951883

BASIS FOR JURISTITION II (A): PLAINTIFF

CHAD EDWARD HOLLEY, IS A CITIZEN OF THE STATE OF OHIO.

SEE ATTACHED BIRTH CERTIFICATE: BORN U.S. CITIZEN

BAISIS JURISTITION: II (B) DEFENDENTS

A&E television networks, LLC.

212 45th Street.

NEW YORK, NY 10017

212-210-1400

PASCO COUNTY SHERIFF OFFICE

8700 Citizen Dr.

New Port Richey, FL. 34654

727-847-8102

Medical Center of Trinity

9330 FL-54. Trinity, FL. 34655

727-834-4000

YOUTUBE, LLC

901 Cherry Ave.

San Bruno, CA. 94066

650-253-0000

ALL PARTIES DOING BUSINESS BOTH IN THE UNITED STATES OF AMERICA AS WELL AS ABROAD.
INCORPORATED UNDER LAWS AND RULES OF VARIOUS STATES AND COUNTIES WITHIN THE U.S.A.

BASIS FOR JURISTITION II (C) AMOUNT IN CONTROVERSY

PENDING FURTHER INVESTIGATION BY THE COURT, DEFENDANT HIMSELF BEING OF LIMITED MEANS AND EDUCATION HATH NO WAY HIMSELF OF ARTICULATING SUCH. ALTHOUGH IT SHOULD BE NOTED, DUE TO THE ABILITY TO CONTINUALLY ACCESS SAID RECORDED CONTENT, NEVER MINDING WHOM EVER MAY HAVE PIRATED FROM THERE. AN HAVING ALREADY BEEN JUDGED AS SUCH WOULD IMPLORE OUR COURT TO CONCIDER HERIN ATTACHED APPENDIX IV WHEN APPLYING WHATEVER REMEDY THEY WOULD SEE FIT. THIS COURT BEING ENDOWED WITH THE POWER OF WISE REASONING OVER ALL THINGS CONCIDERED.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) JAN. 13, 17, at (place) 7941 ERNST RD. N.P.R., FL. 34652,
 the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because (describe the acts or failures to act and why they were negligent)
FAILED, WITH WONTON DISREGARD, TO PROTECT CONFIDENTIAL MEDICAL INFORMATION

SEE APPENDIX III

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by (explain)

BY WAY OF ADDING INSULT TO INJURY WHEN BROADCASTING SUICIDE SITUATION TO THE PUBLIC FOR SCRUTINY WITHOUT CONCENT.

SEE APPENDIX III

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

ACTIONS DESCRIBED, ACTIONS OF DEFENDENTS, RESULTED IN COMPLETE DISPLACEMENT. FURTHER MENTAL ANGUISH. AS WELL AS FINANCIAL LOSS DUE TO HARASSMENT AND PUBLIC SHAMING. PLAINTIFF HAS DOCUMENTED MENTAL HEALTH ISSUES.

SEE APPENDIX IV

APPENDIX III STATEMENT OF CLAIM

On January 13, 2018 A&E television networks, LLC. By and through their Live PD programing recorded at time intervals (1) 28:00-30:44 (2) 33:54-35:45 (3) 38:10-41:25 (4) 44:43-47:10 But not limited to; Did with wonton disregard, through the nationally live televising of an incident, release personal medical information to the public. Specifically a mental health situation covered under standard HIPPA laws. Due to the release of that personal medical information, coupled with facial recognition technology as well as human interfacing. I have real injury both emotionally and physically. As well as complete displacement from an area in which I once called home. (Pasco county, FL, U.S.A. that origin thereby extending throughout our lands) It stands to be noted that at no time was a crime committed nor reported having been committed subsequent to transportation to Medical Center of Trinity for mental health treatment. (they themselves having firsthand knowledge may have intervened) It stands to be noted as the record will indicate that I, of my own doing, did returned seeking that promise of help, to be further injured by the broadcasting of such a personal moment. Additionally, this information may be accessed anytime via YouTube, LLC. Thereby adding insult to injury. (LIVE PD S02E25 13 JAN 18)

Electronic protected health information (ePHI) refers to any protected health information (PHI) that is covered under Health Insurance Portability and Accountability Act of 1996 (HIPAA) security regulations and is produced, saved, transferred or received in an electronic form. There are 18 specific types of electronic protected health information, including patient names, addresses, Social Security numbers, email addresses, fingerprints or photographic images, among others. In addition, any past medical records or payment information is subject to the same degree of privacy protection. Regardless of the type of electronic device -- PC, tablet PC or smartphone -- used to access electronic protected health information, users must abide by HIPAA Security Rule guidelines when handling both information at rest and that which is being transferred electronically, via email or file transfer.

I did not without expectation of compensation or other remuneration, now or in the future, give my consent to [legal entity/organization], its affiliates and agents, to use my image and likeness and/or any interview statements from me in its publications, advertising or other media activities (including the Internet). This consent includes, but is not limited to any. (noting: It would have entitled me to healthcare coverage in and of itself, through any Employee Assistance Program or other. Noting that a "hybrid entity" and any unauthorized disclosure of PHI may still be considered a breach of HIPAA.

In the United States, a sheriff is a sworn law enforcement officer, whose duties vary across states and counties. A sheriff is generally an elected county official, with duties that typically include policing unincorporated areas, maintaining county jails, providing security to courts in the county, and (in some states) serving warrants and court papers. In addition to these policing and correction services, a sheriff is often responsible for enforcing civil law within the jurisdiction. Civil law is a branch of the law. In common law legal systems such as England and Wales, the law of Pakistan and the law of the United States, the term refers to non-criminal law. It would stand to reason that they should not, however engage in cohesive tactics, by way of any communication of public injury, possibly resulting in furthering any one individual or their own shame by way of. Especially when concerning confidential medical conditions.

I would implore the court to utilize the reasonable man doctrine when considering those business associates engaged with them.

APPENDIX IV BASIS FOR RELIEF SOUGHT

The value of life is an economic value used to quantify the benefit of avoiding a fatality.[1] It is also referred to as the cost of life, value of preventing a fatality (VPF) and implied cost of averting a fatality (ICAF). In social and political sciences, it is the marginal cost of death prevention in a certain class of circumstances.[citation needed] In many studies the value also includes the quality of life, the expected life time remaining, as well as the earning potential of a given person especially for an after the fact payment in a wrongful death claim lawsuit. As such, it is a statistical term, the cost of reducing the average number of deaths by one. It is an important issue in a wide range of disciplines including economics, health care, adoption, political economy, insurance, worker safety, environmental impact assessment, and globalization. [citation needed] In industrial nations, the justice system considers a human life "priceless", thus illegalizing any form of slavery; i.e., humans cannot be bought at any price. However, with a limited supply of resources or infrastructural capital (e.g. ambulances), or skill at hand, it is impossible to save every life, so some trade-off must be made. Also, this argumentation neglects the statistical context of the term. It is not commonly attached to lives of individuals or used to compare the value of one person's life relative to another person's. It is mainly used in circumstances of saving lives as opposed to taking.

United States

The following estimates have been applied to the value of life. The estimates are either for one year of additional life or for the statistical value of a single life. \$50,000 per year of quality life (the "dialysis standard", [11] which had been a de facto international standard most private and government-run health insurance plans worldwide use to determine whether to cover a new medical procedure)[12]

\$129,000 per year of quality life (an update to the "dialysis standard") [13][12]

\$9.1 million (Environmental Protection Agency, 2010)[14]

\$7.9 million (Food and Drug Administration, 2010)[14]

\$9.4 million (Department of Transportation, 2015)[15]

\$9.6 million (Department of Transportation, Aug. 2016)[16]

The income elasticity of the value of statistical life has been estimated at 0.5 to 0.6.[4] Developing markets have smaller statistical value of life.[4] The statistical value of life also decreases with age.[4] Historically, children were not valued very much but modern cultural norms attach a much higher valuing lives or "producing" lives.

AT THIS POINT, BEING A LAYMEN IN THE LAW, BEGGING A LESS STRINGENT STANDARD OF REVIEW, WITHOUT REPRESENTATION, PRAYING OUR HONORABLE COURT APPLY THE REASONABLE MAN DOCTRINE.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 9/14/2018

Signature of Plaintiff

Printed Name of Plaintiff


CHAD EDWARD HOLLEY

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

1087 W. 2nd St.
XENIA, OHIO 45385
cholley66@gmail.com